

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

<b>FORD MOTOR COMPANY,</b>	§	
	§	
<b>Plaintiff/Counter-Defendant,</b>	§	<b>Case No. 15-10628-MFL-EAS</b>
	§	
<b>v.</b>	§	<b>(Consolidated with</b>
	§	<b>Case No. 15-11264-MFL-EAS)</b>
<b>VERSATA SOFTWARE, INC. f/k/a</b>	§	
<b>TRILOGY SOFTWARE, INC.,</b>	§	
<b>VERSATA DEVELOPMENT</b>	§	<b>Hon. Matthew F. Leitman</b>
<b>GROUP, INC., AND VERSATA, INC.</b>	§	
	§	<b>JURY TRIAL DEMANDED</b>
<b>Defendants/Counter-Plaintiffs.</b>	§	
	§	

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**JOINT MOTION TO EXTEND TIME  
TO FILE *DAUBERT* BRIEFING**

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Ford Motor Company (“Ford”) and Versata Software, Inc., f/k/a Trilogy Software, Inc., Versata Development Group, Inc. and Versata, Inc. (“Versata”) jointly seek an extension of time for the parties to file responses and replies to Ford’s Motions to exclude the supplemental report of Versata’s damages experts (Craig Elson and Chris Bokhart) and the declaration of Seth Krauss on apportionment (Dkt. Nos. 568, 573) due to recent health issues suffered by Mr. Krauss.

Mr. Krauss recently underwent major surgery and is still in the process of recovering, which is taking longer than anticipated. Versata requires Mr. Krauss’ input in order to finalize its response to Ford’s motion to exclude his declaration.

Moreover, Mr. Krauss wishes to participate in the preparation of the response to address the points raised by Ford. Accordingly, the parties agreed to extend the *Daubert* briefing schedule against Mr. Krauss' declaration by one week. Given the intertwined nature of Mr. Krauss' declaration with the supplemental damages report by Messrs. Elson and Bokhart, the parties also agreed to extend that *Daubert* briefing by one week. With the Court's permission, this would put all three of Ford's *Daubert* motions on the same briefing schedule. *See* January 17, 2019 Order granting Joint Motion for Extension of Time (Dkt. No. 586).

Thus, the parties respectfully request that the response deadline for Ford's *Daubert* motions against Messrs. Elson and Bokhart (Dkt. No. 568) and the declaration of Seth Krauss (Dkt No. 573) be extended to February 1, 2019 and the deadline for replies be set to February 15, 2019.

Dated: January 24, 2019

**AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI &  
MENSING P.C.**

/s/ Steven J. Mitby

Amir Alavi

Texas Bar No. 00793239

aalavi@azalaw.com

Steven J. Mitby

Texas Bar No. 24037123

smitby@azalaw.com

Scott W. Clark

Texas Bar No. 24007003

sclark@azalaw.com

Iftikhar Ahmed

Texas Bar No. 24064795

iftiahmed@azalaw.com

Jane Robinson

Texas Bar No. 24062970

jrobinson@azalaw.com

Kyung (Drew) Kim

Texas Bar No. 24007482

dkim@azalaw.com

Kyril Talanov

Texas Bar No. 24075139

ktalanov@azalaw.com

Masood Anjom

Texas Bar No. 24055107

manjom@azalaw.com

Michael McBride

Texas Bar No. 24065700

mmcbride@azalaw.com

Matthew Caldwell

Michigan State Bar No. P79462

mcaldwell@azalaw.com

**AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI &  
MENSING P.C.**

1221 McKinney Street, Suite 2500

Houston, TX 77010

**BROOKS KUSHMAN P.C.**

/s/ John S. LeRoy

John S. LeRoy

jleroy@brookskushman.com

Thomas A. Lewry

tlewry@brookskushman.com

Christopher C. Smith

csmith@brookskushman.com

Chanille Carswell

ccarswell@brookskushman.com

John P. Rondini

jrondini@brookskushman.com

Jonathan D. Nikkila

jnikkila@brookskushman.com

Amy Leshan

aleshan@brookskushman.com

**BROOKS KUSHMAN, P.C.**

1000 Town Center, 22<sup>nd</sup> Floor

Southfield, Michigan 48075

Tel.: (248) 358-4400

Fax: (248) 358-3351

James P. Feeney

**DYKEMA GOSSETT, PLLC**

39577 Woodward Ave., Suite

300

Bloomfield Hills, MI 48304

Tel.: (248) 203-0841

jfeeney@dykema.com

Telephone: 713-655-1101  
Facsimile: 713-655-0062

Daniel K. Webb  
DWebb@winston.com  
Matthew R. Carter  
MCarter@winston.com  
**WINSTON & STRAWN, LLP**  
35 W. Wacker Drive  
Chicago, IL 60601  
Phone (312) 558-5600  
Facsimile (312) 558-5700

Jaye Quadrozzi  
Rodger D. Young  
efiling@youngpc.com  
**YOUNG & ASSOCIATES**  
27725 Stansbury Blvd., Suite 125  
Farmington Hills, Michigan 48334  
Telephone: 248-353-8620

**ATTORNEYS FOR DEFENDANTS**

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**PROOF OF SERVICE**

Steven J. Mitby certifies that on January 24, 2019, he served the above Motion and this Proof of Service upon all counsel of record via electronic filing.

I declare under the penalty of perjury that the statements made above are true to the best of my knowledge, information, and belief.

/s/ Steven J. Mitby

**AHMAD, ZAVITSANOS, ANAIPAKOS,  
ALAVI & MENSING, P.C.**

Steven J. Mitby  
1221 McKinney, Suite 2500  
Houston, Texas 77010  
(713) 655-1101 (Phone)